

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GARY W. SGOUROS, on behalf of himself)
and all others similarly situated,)
Plaintiff,) No. 14-cv-1850
v.) Judge John Z. Lee
TRANSUNION CORP., TRANS UNION LLC,)
and TRANSUNION INTERACTIVE, INC.)
Defendants.)

UNCONTESTED MOTION FOR ENTRY OF AGREED CONFIDENTIALITY ORDER

Defendants TransUnion Intermediate Holdings, Inc., formerly known as TransUnion Corp.; Trans Union LLC and TransUnion Interactive, Inc. (“Defendants”), by their undersigned counsel, move this Court pursuant to Federal Rule of Civil Procedure 26(c) for entry of an Agreed Confidentiality Order to facilitate the exchange of confidential information between Defendants and Plaintiff Gary W. Sgouros (“Plaintiff”). In support of their Motion, Defendants state as follows:

1. In his Second Amended Class Action Complaint, Plaintiff alleges that Defendants violated the Fair Credit Reporting Act (the “FCRA”) and the Missouri Merchandising Practices Act in connection with their marketing and sale of a credit score to Plaintiff. [DK 84.]
2. Specifically, Plaintiff claims in Count I that Defendants violated Section 1681g(f)(7)(A) of the FCRA because the score that Plaintiff purchased from Defendants did not meet the requirements of that provision, which requires that

. . . .a consumer reporting agency shall. . . .supply the consumer with a credit score that is derived from a credit scoring model that is widely distributed to users by that consumer reporting agency in connection with residential real property loans or with a credit score that assists the consumer in understanding the credit

scoring assessment of the credit behavior of the consumer and predictions about the future credit behavior of the consumer.

3. Plaintiff further claims, in Count III, that Defendants allegedly concealed material characteristics of the TransUnion Consumer Credit Score from Plaintiff.¹

4. Documents and information requested and produced during this litigation will contain confidential and proprietary information about Defendants, Plaintiff, and third parties.

5. Counsel for the parties conferred and agreed that the Agreed Confidentiality Order, attached hereto as Exhibit A, is necessary for the protection of this confidential and proprietary information.

6. Pursuant to local rule, Defendants also attach hereto, as Exhibit B, a redline of the Agreed Confidentiality Order against this district's L.R. 26.2 Model Confidentiality Order.

WHEREFORE, Defendants TransUnion Intermediate Holdings, Inc., formerly known as TransUnion Corp., Trans Union LLC and TransUnion Interactive, Inc. respectfully request that the Court grant this motion and enter the attached Agreed Confidentiality Order, and award any other relief the Court deems just and proper.

Dated: December 15, 2016

Respectfully submitted,

TRANSUNION INTERMEDIATE
HOLDINGS, INC.; TRANS UNION LLC;
and TRANSUNION INTERACTIVE, INC.

By: s/ Dawn M. Beery
One of Their Attorneys

Michael O'Neil (ARDC# 6201736)
Dawn M. Beery (ARDC # 6256520)
Timothy R. Carwinski (ARDC # 6299248)

¹ Count II was voluntarily dismissed. (See Dkt. 100.)

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CERTIFICATE OF SERVICE

The undersigned, an attorney, states that on December 15, 2016, the foregoing ***Uncontested Motion For Entry Of Agreed Confidentiality Order*** was filed electronically with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to all attorneys of record.

Respectfully submitted,

By: s/ Dawn M. Beery
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